

**Montana Board of Oil and Gas Conservation
Environmental Assessment**

Operator: Primary Petroleum Corporation
Well Name/Number: Ralston Gap 4-2-25-6
Location: NW NW Lot 4 Section 2 T25N R6W
County: Teton, **MT;** **Field (or Wildcat)** Wildcat

Air Quality

(possible concerns)

Long drilling time: No, 10 to 14 days drilling time.

Unusually deep drilling (high horsepower rig): No, triple derrick drilling rig to drill to 5,500' TD Devonian Duperow Formation test.

Possible H2S gas production: Yes possible H2S gas production.

In/near Class I air quality area: No Class I air quality area.

Air quality permit for flaring/venting (if productive): Yes, DEQ air quality permit required under rule 75-2-211.

Mitigation:

☒ Air quality permit (AQB review)

☐ Gas plants/pipelines available for sour gas

☐ Special equipment/procedures requirements

☐ Other: _____

Comments: No special concerns – using triple derrick drilling rig to drill to 5,500'

TD.

Water Quality

(possible concerns)

Salt/oil based mud: No, freshwater and freshwater mud system. Surface to total depth will be drilled with freshwater/mud system.

High water table: No high water table anticipated.

Surface drainage leads to live water: No, closest drainage is an unnamed ephemeral tributary drainage to the Foster Creek, about 3/8 of a mile to the north from this location.

Water well contamination: None, closest water wells are about 1/2 of a mile to the east southeast and 3/4 of a mile to the southeast from this location. All other water wells are 1 mile and further away. These wells are 64' and 270' in depth. This well will drill surface hole with freshwater, set 750' of steel surface casing and cement to surface.

Porous/permeable soils: No, sandy silty bentonitic soils.

Class I stream drainage: None

Mitigation:

☐ Lined reserve pit

☒ Adequate surface casing

☐ Berms/dykes, re-routed drainage

☒ Closed mud system

☐ Off-site disposal of solids/liquids (in approved facility)

☐ Other: _____

Comments: 750' of surface casing cemented to surface adequate to protect freshwater zones. Freshwater mud system to be used to drill from base of surface to total depth.

Soils/Vegetation/Land Use

(possible concerns)

Stream crossings: None anticipated.

High erosion potential: No, small cut, up to 8.6' and small fill, up to 1.7', required.

Loss of soil productivity: No, location will be restored after drilling, if nonproductive. If productive unused portion of drillsite will be reclaimed.

Unusually large wellsite: No, 350'X350' location size required.

Damage to improvements: Slight, appears to be cultivated land.

Conflict with existing land use/values Slight

Mitigation

☐ Avoid improvements (topographic tolerance)

☐ Exception location requested

☒ Stockpile topsoil

☐ Stream Crossing Permit (other agency review)

☒ Reclaim unused part of wellsite if productive

☐ Special construction methods to enhance reclamation

☐ Other _____

Comments: Access will be over existing state highway #89, county gravel roads and over private farm/ranch roads. New access road from farm/ranch road will be constructed, about ¾ of a mile. Cuttings will be stockpiled on location. Drilling fluids will be recycled to the next drilling location. No pit will be utilized. No special concerns.

Health Hazards/Noise

(possible concerns)

Proximity to public facilities/residences: Nearest residences are about ¾ of a mile to the north, about 1 mile to the southwest, 1.125 miles to the northeast and about 1.5 miles to the east is the Miller Hutterite Colony from this location.

Possibility of H2S: Yes H2S possible.

Size of rig/length of drilling time: Triple derrick/Double drilling rig/short 10 to 14 days drilling time.

Mitigation:

☒ Proper BOP equipment

☐ Topographic sound barriers

☐ H2S contingency and/or evacuation plan

☐ Special equipment/procedures requirements

☐ Other: _____

Comments: No concerns. Distance is sufficient to not be a problem with noise.

Wildlife/recreation

(possible concerns)

Proximity to sensitive wildlife areas (DFWP identified): About 12.5 miles to the west is the Blackleaf State Wildlife Management Area. About 16.5 miles to the west is the Lewis & Clark National Forest boundary.

Proximity to recreation sites: About 3 miles to the west is Bynum Reservoir, About 12.5 miles to the west is the Blackleaf State Wildlife Management Area. About 16.5 miles to the west is the Lewis & Clark National Forest boundary.

Creation of new access to wildlife habitat: No

Conflict with game range/refuge management: No

Threatened or endangered Species: Threatened or endangered Species listed on USFWS website for counties in Montana lists the following: Grizzly Bear and Canada

Lynx. Candidate species listed are the Sprague's Pipit, Wolverine and the White bark pine. NH Tracker website lists the following as species of concern five (5) Ferruginous Hawk, Black Tern, Bald Eagle, Horned Grebe and McCown's Longspur.

Mitigation:

- ☐ Avoidance (topographic tolerance/exception)
- ☐ Other agency review (DFWP, federal agencies, DSL)
- ☐ Screening/fencing of pits, drillsite
- ☐ Other: _____

Comments: Private cultivated surface lands. There maybe species of concern that maybe impacted by this wellsite. We ask the operator to consult with the surface owner as to what he would like done, if a species of concern is discovered at this location. The Board of Oil & Gas has no jurisdiction over private surface lands.

Historical/Cultural/Paleontological

(possible concerns)

Proximity to known sites None identified

Mitigation

- ☐ avoidance (topographic tolerance, location exception)
- ☐ other agency review (SHPO, DSL, federal agencies)
- ☐ Other: _____

Comments: Private cultivated surface lands. There maybe possible historical/cultural/paleontological sites that maybe impacted by this wellsite. We ask the operator to consult with the surface owner as to his desires to preserve these sites or not, if they are found during construction of the wellsite. The Board of Oil & Gas has no jurisdiction over private surface lands.

Social/Economic

(possible concerns)

- ☐ Substantial effect on tax base
- ☐ Create demand for new governmental services
- ☐ Population increase or relocation

Comments: Wildcat well, until production is established no social/economic concerns can be evaluated. No concerns

Remarks or Special Concerns for this site

Well is a 5,500' TD Devonian Duperow Formation test.

Summary: Evaluation of Impacts and Cumulative effects

No long term impacts expected. Some short term impacts will occur, but can be mitigated in a short time.

I conclude that the approval of the subject Notice of Intent to Drill (does/**does not**) constitute a major action of state government significantly affecting the quality of the

human environment, and (does/**does not**) require the preparation of an environmental impact statement.

Prepared by (BOGC): /s/Steven Sasaki
(title:) Chief Field Inspector
Date: November 23, 2011

Other Persons Contacted:
Montana Bureau of Mines and Geology, GWIC website
(Name and Agency)
Teton County water wells.
(subject discussed)
November 23, 2011
(date)

US Fish and Wildlife, Region 6 website
(Name and Agency)
ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES
MONTANA COUNTIES, Teton County
(subject discussed)
November 23, 2011
(date)

Montana Natural Heritage Program Website (FWP)
(Name and Agency)
Heritage State Rank= S1, S2, S3, T25N R6W
(subject discussed)
November 23, 2011
(date)

If location was inspected before permit approval:
Inspection date: _____
Inspector: _____
Others present during inspection: _____